

1 **TIFFANY & BOSCO, P.A.**

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6 JPMorgan Chase Bank, National Association
7 17-72652

8 **UNITED STATES BANKRUPTCY COURT**

9 **DISTRICT OF NEVADA**

10 IN RE:

11 Ovidiu Remus Ene

12 Debtors.

13 No. 17-14384-mkn

14 Chapter 13

15 Date: December 3, 2017

16 Time: 1:30 p.m.

17 **OBJECTION TO CONFIRMATION OF PROPOSED CHAPTER 13 PLAN**

18 JPMorgan Chase Bank, National Association, Secured Creditor in the above-entitled Bankruptcy
19 proceeding, hereby submits the following objection to that certain Chapter 13 Plan proposed by the
20 Debtors:

21 This objecting secured creditor holds the first Deed of Trust on the subject property generally
22 described as 6635 W Oquendo Road, Las Vegas, NV 89118. As of August 10, 2017, the amount in default
23 was approximately \$14,628.94, pursuant to the forthcoming proof of claim to be filed by JPMorgan Chase
24 Bank, National Association. The Debtors' Chapter 13 Plan lists the arrearage owing to Secured Creditor as
25 \$0.00. Secured creditor requests that the arrearages as will be set forth in the Proof of Claim be filed
26 through the Plan.

1 Any Chapter 13 Plan proposed by the Debtors must provide for and eliminate of the Objections
2 specified above in order to be feasible and to provide adequate protection to this Secured Creditor.

3 It is respectfully requested that Confirmation of the Chapter 13 Plan as proposed by the Debtors be
4 denied.

5 WHEREFORE, Secured Creditor prays as follows:

- 6 1. That confirmation of the proposed Chapter 13 Plan be denied;
7 2. For attorney's fees and costs incurred herein;
8 3. For such other and further relief as this Court deems just and proper.

9
10 DATED this 2 day of November, 2017.

11
12 **TIFFANY & BOSCO, P.A.**

13 By /s/ Gregory L. Wilde

14 **Gregory L. Wilde, Esq.**
15 Attorney for Secured Creditor
16 212 South Jones Boulevard
17 Las Vegas, NV 89107
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No. 17-14384-mkn

Chapter 13

Date: December 3, 2017
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15
16 **CERTIFICATE OF MAILING OF OBJECTION TO**
17 **CONFIRMATION OF PROPOSED CHAPTER 13 PLAN**

18 1. On 11/2/17 I served the following documents:

19 **OBJECTION TO CONFIRMATION OF PROPOSED CHAPTER 13 PLAN**

20 2. I caused to be served the above-named document by the following means to the persons as listed
21 below:

22 **X a. ECF System**

23
24 Roger P. Croteau
25 croteaulaw@croteaulaw.com
26 Attorney for Debtors

Kathleen A. Leavitt

1 courtsecf3@las13.com
2 Trustee

3 **X b. United States mail, postage fully prepaid:**

4 Ovidiu Remus Ene
5 5840 Red Rock Street
6 Las Vegas, NV 89118
Debtors

7 **I declare under penalty of perjury the foregoing is true and correct.**

8 DATED this 2nd day of November, 2017.

9 By: /s/ Brad Anderson